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July 25, 2018

By ECFHonorable Anita B. Brody
United States District Court
Eastern District of Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street, Room 7613
Philadelphia, PA 19106*In re: Nat'l Football League Players' Concussion Injury Litig., No. 12-md-2323-AB;
Turner v. Nat'l Football League, No. 14-cv-00029-AB; Hernandez v. Nat'l Football
League, No. 18-cv-00464-AB; Scroggins v. Nat'l Football League, No. 16-cv-02058-AB*

Dear Judge Brody:

We write on behalf of the National Football League, NFL Properties LLC, and the National Football League Foundation (collectively, the "NFL Defendants") to propose a briefing schedule for the NFL Defendants' motion to dismiss the complaints filed by Settlement Class Members Tracy Scroggins, Rose Stabler, and A.H. (the "Motion to Dismiss") and A.H.'s motion to remand claims against the NFL Defendants and Riddell¹

¹ The Riddell defendants in *Hernandez v. Nat'l Football League* are Riddell, Inc., Riddell Sports Group, Inc., All American Sports Corp., BRG Sports Corp. f/k/a Easton-Bell Sports, Inc., BRG Sports, LLC f/k/a Easton Bell Sports, LLC, and BRG Sports Holdings Corp. f/k/a BRG Holdings Corp.

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*NOT ADMITTED TO THE NEW YORK BAR

Hon. Anita B. Brody

2

to the Superior Court of Massachusetts (the “Remand Motion”). Counsel for the NFL Defendants, Scroggins and Stabler, A.H., and Riddell have conferred on and jointly propose this schedule to the Court.

Although the NFL Defendants have not yet filed the Motion to Dismiss, on July 18, 2018, they moved for leave to file certain portions of the Motion to Dismiss under seal (ECF No. 10148). Within five days of the Court’s order on their motion to seal, the NFL Defendants will file an appropriate version of the Motion to Dismiss on the public docket—assuming that the Court grants permission to do so.

Also on July 18, 2018, A.H. filed the Remand Motion (ECF No. 10149). Any opposition to the Remand Motion is currently due August 1, 2018.

Counsel for the NFL Defendants, Scroggins and Stabler, A.H., and Riddell propose the following briefing schedule for these motions:

- Opposition to the Remand Motion and Opposition to the Motion to Dismiss Due: 60 days after the filing of the Motion to Dismiss.
- Reply in Support of Remand Motion and Reply in Support of Motion to Dismiss Due: 30 days after the deadline for filing the opposition briefs.

The NFL Defendants enclose a proposed order reflecting this schedule.

Respectfully submitted,

/s/ Bruce Birenboim
Bruce Birenboim

Enclosure

cc: All counsel of record (via ECF)
George J. Leontire (via FedEx)